

# FLYNN & WIETZKE, P.C.

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January 28, 2021

Honorable Gregory H. Woods  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

RE: AHMED GAYNOR V. PATH  
20 Civ. 2314 (GHW)

Dear Judge Woods:

We are plaintiff's counsel and jointly write with defendant to provide a Status Report pursuant to the Court's Order of November 23, 2021. (Dkt #14)

- 1) all existing deadlines, due dates, and/or cut-off dates;
  - a. Expert discovery closed on 1/26/2021
- 2) a brief description of any outstanding motions;
  - a. None.
- 3) a brief description of the status of discovery and of any additional discovery that remains to be completed;
  - a. Discovery is complete.
- 4) the status of settlement discussions;
  - a. Plaintiff made a demand on January 27, 2021.
- 5) the anticipated length of trial and whether the case is to be tried to a jury;
  - a. Trial is expected to last 4 days and is to be tried to a jury
- 6) whether the parties anticipate filing motions for summary judgment; and
  - a. No summary judgment motions are planned

- 7) any other issue that the parties would like to address at the pretrial conference or any other information that the parties believe may assist the Court.
  - a. It would seem this is a good time to be referred to the Magistrate Judge for a settlement conference.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Marc Wietzke", written in a cursive style.

Marc Wietzke

MW:EF

cc: Brian Hodgkinson, Esq.